



U.S. Department
of Transportation
**Federal Aviation
Administration**

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APR 20 2015

Mr. Marshall S. Filler
Counsel for the Aeronautical Repair Station Association
Aeronautical Repair Station Association
121 North Henry Street
Alexandria, VA 22314-2903

Dear Mr. Filler.

Thank you for your May 28, 2014 letter. We regret our delay in responding to your letter. The letter was forwarded to the Manager, Aircraft Maintenance Division (AFS-300) for a response. Upon review of your letter, it appears your concerns and recommendations are related to policy interpretation rather than the Consistency and Standardization process¹.

Your letter requests that the FAA consider the recommendations below concerning the ability of a repair station to develop and use internal work instructions without prior acceptance or approval by or from the FAA. The FAA has reviewed your recommendations and our response is as follows.

ARSA Recommendation: Confirm that a repair station may create work instructions for its technical personnel.

FAA Response: An appropriately certificated and rated repair station may develop its own work instructions/shop travelers based on manufacturer's maintenance data and/or other methods, techniques and practices acceptable to the FAA.

ARSA Recommendation: Confirm that use of such documents (work instructions) is not *per se* unacceptable to the agency.

FAA Response: As stated above, use of manufacturers' maintenance data and/or other methods, techniques and practices acceptable to the FAA would be acceptable.

ARSA Recommendation: Confirm that the maintenance data required by 14 CFR part 145.109(d)² must be applicable (relevant) to the maintenance function and accessible when the relevant work is being performed. It need not be in the physical possession of the technician.

¹ Generally, the CSI process is reserved for stakeholders that are regulated by the FAA and the process provides those stakeholders an opportunity to request reconsideration of an aviation safety-related decision made by an FAA, AVS office in performing their regulatory responsibilities.

² 14 CFR §145.109 Equipment, materials, and data requirements. (d) A certificated repair station must maintain, in a format acceptable to the FAA, the documents and data required for the performance of maintenance, preventive maintenance, or alterations under its repair station certificate and operations specifications in accordance with part 43. The following documents and data must be current and accessible when the relevant work is being done: (1) Airworthiness directives, (2) Instructions for continued airworthiness, (3) Maintenance manuals, (4) Overhaul manuals, (5) Standard practice manuals, (6) Service bulletins, and (7) Other applicable data acceptable to or approved by the FAA.

FAA Response: The FAA agrees with the requirements of the regulation, which require the appropriate documents, including maintenance manuals to be "...current and accessible..." when the relevant work is being accomplished.

ARSA Recommendation: Issue an Advisory Circular on the development and use of work instructions based on 14 CFR parts 21, 43, and 145.

FAA Response: The FAA will take this recommendation into consideration as workload permits.

ARSA Recommendation: Review and revise information in the Flight Standards Information Management System (FSIMS) for auditing maintenance data, including development and use of work instructions under part 14 CFR 145, to reflect the information contained in paragraphs (III)(A), (B) and (D)³.

FAA Response: We will review the current guidance contained in FAA Oder 8900.1 Volume 6, Chapter 11, Section 2, *Conduct a Detailed Process/Task Inspection* to determine if it adequately addresses both use and acceptable content of maintenance provider work instructions. We will further review other applicable sections of this Order and make revisions to those sections as necessary.

We appreciate this opportunity to review and respond to your recommendations and concerns. If you have any additional questions regarding this letter, please contact Patricia Williams, Manager, Repair Station Branch (AFS-340) at (202) 267-1684.

Sincerely,



John S. Duncan
Director, Flight Standards Service

³ Reference to paragraphs (III)(A), (B) and (D) of the May 28, 2014, letter.